



**Derbyshire**  
Wildlife Trust

Sandy Hill, Main Street,  
Middleton, Matlock, DE4 4LR

T 01773 881188

E [enquiries@derbyshirewt.co.uk](mailto:enquiries@derbyshirewt.co.uk)

 @derbyswildlife

 Derbyshire Wildlife Trust

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Adam Reddish  
Principal Planning Officer  
Erewash Borough Council  
Town Hall  
Long Eaton  
Derbyshire  
NG10 1HU

10<sup>th</sup> June 2025

Dear Adam,

**Re: Erewash Core Strategy Review Amendment consultation**

Derbyshire Wildlife Trust welcomes the opportunity to comment on the above review. Our response is set out below.

**1.0 Introduction**

To assist us in responding to the consultation we have undertaken an ecological desktop assessment of 8 sites in Erewash Borough. Each site has been reviewed against the biodiversity data available to the Trust. In the case of one site we have carried out a site visit due to its proximity to a designated Local Wildlife Site and Local Nature Reserve.

**2.0 Methodology**

The SHLAA sites have been assessed against the Derbyshire Biodiversity Alert Map, which is maintained by DWT as part of our role as the Biological Records Centre for Derbyshire. We have also used Bing Maps Hybrid and Google Maps to assist in identifying habitat types and land-use.

The Biodiversity Alert Map includes the following datasets:

- ❖ Presence of protected species including water vole, otter, badger, selected bird species, white-clawed crayfish, bat roosts, great crested newt and reptiles.
- ❖ Species datasets for UK or Species of Principal Importance as listed on S41 NERC Act 2006 or Red List Bird species<sup>1</sup>
- ❖ Presence of plant species listed on the Derbyshire Vascular Plant Red Data List.
- ❖ Presence of any statutory or non-statutory sites of ecological interest (SSSIs, Local Nature Reserves, Local Wildlife Sites, Regionally Important Geological Sites)
- ❖ Presence of any existing potential Local Wildlife Sites
- ❖ Presence of Habitats of Principal Importance as listed on S41 NERC Act 2006 (also referred to as UK BAP Priority habitat types).
- ❖ Presence of ancient semi-natural woodland.
- ❖ Presence of other stands of woodland (broad-leaved or coniferous)
- ❖ Presence of other areas of semi-natural grassland
- ❖ Black poplar records
- ❖ Veteran tree records

The desktop assessment of each of the sites is based upon the best information available to us at the current time. However, we are not responsible for any changes to the results of this assessment following more up to date field surveys or new information provided by local people or communities. Detailed ecological information is often incomplete and can be quite old. Small areas of more valuable habitat can also be difficult to pick up through survey work or aerial images.

Many species are mobile and can colonise or temporarily use sites where they have not previously been recorded. There is therefore the potential for almost any site to support evidence of protected species, and the likelihood of their presence increases as sites increases in size and / or habitat complexity. Detailed ecological surveys are always required to provide up to date information if a site comes forward for planning permission.

Irreplaceable habitats include Ancient Woodland, Veteran trees and Lowland Fen in Derbyshire and for the most part direct impacts on these features have not been identified. But there are a few sites that do include or are adjacent to these features.

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<sup>1</sup> Birds of Conservation Concern 5. RSPB.

Most sites support hedgerows to some extent and often these hedgerows are comprised of native shrub and tree species. It is very common to find hedgerows that meet the definition for a Habitat of Principal Importance (80% native). Hedgerows are often retained within developments or where losses do occur it is possible to create new species rich native hedgerows as part of the development. Hedgerows are therefore unlikely to be a significant constraint to a development.

#### Categories of potential impact

I have assigned the sites to one of the following categories based on the potential impact of development on the species and habitats and nature conservation designations. I have also taken the size of each site into consideration as the significance of impacts are typically higher for larger sites. Categories are set out below:

**High** – sites where there is a risk of loss or adverse impacts on Habitats and/or Species of Principal Importance and potentially smaller impacts on irreplaceable habitat. There may also be significant concerns around indirect impacts on adjacent sites. Achieving a biodiversity net gain on these sites could still be challenging and could require reduced development footprint and/or off-site compensation schemes. Information on some of these sites is more limited.

**Medium** – sites where we are not aware of any habitats or designations of high nature conservation value, but where there could be species impacts or impacts on habitats of local biodiversity value (e.g. some types of grassland and wetland or woodlands and trees) or where information is difficult to interpret.

**Low** – sites where we are not aware of any features of high nature conservation value and where the available information indicates that the main habitats are likely to be of lower value for example, arable, modified grassland or hardstanding.

Some sites are considered to fall between two categories due to the presence of habitats of varying value and / or uncertainty over the extent to which features will be impacted by the development for example **Low – Medium and Medium – High**.

Habitat distinctiveness – the distinctiveness of habitats is referred to in the text below and relates to the Statutory Biodiversity Metric which assigns different habitats levels of distinctiveness from Low to Very High.

### **3.0 Site assessments**

#### **3.1 Site name: Land west of Draycott**

**Size: 12.67 ha**

#### Potential impact on features of ecological importance / value

**Low to medium**

The overall impact is assessed as Low to Medium based on the desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected. However, there is the potential for habitats of greater value to be present including woodland. Nonetheless most of the habitats will probably be low or medium distinctiveness. Impacts on species are probably at a local scale but the breeding bird assemblage could be more significant and require a bespoke compensation measure. For most other species the impacts can probably be addressed through general mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

#### Nature conservation designations

There are no statutory or non-statutory sites present within the boundary of the site. There are no potential Local Wildlife Sites identified within this boundary or immediately adjacent.

#### Irreplaceable habitat

There are no records for irreplaceable habitats at this location.

#### Protected Species

There are records in the general locality and there is a possibility of protected species on the site or adjacent to the site. Species that could be present include bats, reptiles, breeding birds and mammals.

#### Habitats of Principal Importance

Possibly Lowland Mixed Deciduous Woodland

#### Species of Principal Importance

There are records from this area potentially including this site as well as nearby (within 1km) fields. A range of bird species are recorded from the area, and it is likely that some breeding birds will be present and some could be SPI. Equally as stated above reptiles and bats are possible, and bats

could be roosting in budlings within the site. It is highly likely that bats forage and commute along field boundaries and around established woodlands. Hedgehogs are known to occur locally.

#### Comments on potential ecological / biodiversity impacts

This is a relatively large site that includes small areas of semi-natural deciduous woodland. These woodlands will need to be surveyed, and their exact habitat type determined. They are likely to be either Lowland Mixed Deciduous Woodland or 'other broadleaved woodland'. In either case it is advisable for the woodlands to be retained as part of the greenspace within any development of the site. Retention of woodland will also significantly reduce the overall biodiversity impact from any development of this area. Most of the grassland on-site is of indeterminate type based on the desktop study. We have no information indicating that the grassland is of high nature conservation value. It is likely that the grassland will be modified (species poor) grassland or other neutral grassland. These are low and medium distinctiveness habitats (as ascribed in the Biodiversity Metric) respectively and their loss is usually addressed through the creation or enhancement of grassland either on-site or off-site. The western fields appear to be arable land which is typically of low nature conservation value. However, arable and grasslands on site could be supporting breeding bird assemblages in summer and wintering birds such as fieldfare and redwing. Targeted surveys will be needed to assess the impact and to identify mitigation and compensation measures should development take place.

### **3.2 Site name: Land east of Breaston**

**Size: 2.74 ha**

#### Potential impact on features of ecological importance / value

**Low**

The overall impact is assessed as Low based on the desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are of low or medium distinctiveness. Impacts on species are probably on a local scale but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

#### Nature conservation designations

There are no statutory or non-statutory sites present within the boundary of the site. There are no potential Local Wildlife Sites identified within this boundary or immediately adjacent.

#### Irreplaceable habitat

There are no records for irreplaceable habitats at this location.

#### Protected Species

Breeding birds are present probably nesting in the hedgerows and trees. There are no other specific records for protected species at this location. However, bats are widespread and probably use the site for foraging and commuting. Hedgehogs are also known from the wider area. Other protected mammals could be present.

#### Habitats of Principal Importance

There are no records of HPI on site. However, hedgerows are present both along boundaries and internally and some of these could qualify as HPI. The eastern boundary hedge and the hedge along the southern boundary both look like they could be valuable locally and should be retained.

#### Species of Principal Importance

There are no records other than song thrush recorded locally in gardens. Bat species and hedgehog are present in the wider environment and other bird species are possible.

#### Comments on potential ecological / biodiversity impacts

The site is relatively small and appears to have been used for horse grazing to some extent. Most of the grassland on-site is of indeterminate type based on the desktop study. We have no information indicating that the grassland is of high nature conservation value. It is likely that the grassland will be modified (species poor) grassland or other neutral grassland. These are low and medium distinctiveness habitats (as ascribed in the Biodiversity Metric) respectively and their loss is usually addressed through the creation or enhancement of grassland either on-site or off-site. There are scattered trees present within the site, and these will need to be surveyed and assessed. Wherever possible trees should be retained as part of any development.

### **3.3 Site name: Land west of Borrowash**

**Size: 13.31**

#### Potential impact on features of ecological importance / value

##### **Low**

The overall impact is assessed as Low based on the desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are of low or medium distinctiveness. Impacts on species are probably on a local scale but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

#### Nature conservation designations

There are no statutory or non-statutory sites present within the boundary of the site. There are no potential Local Wildlife Sites identified within this boundary or immediately adjacent.

#### Irreplaceable habitat

There are no records for irreplaceable habitats at this location.

#### Protected Species

Breeding birds are present probably nesting in the hedgerows and trees. There are no other records for protected species at this location. However, bats are widespread and probably use the site for foraging and commuting. Hedgehogs are also known from the wider area.

#### Habitats of Principal Importance

There are no records of HPI on site. However, hedgerows are present and could qualify as HPI. There is a small area of scrub/woodland present in the south of the site and this could potentially be of greater interest. However, it is small and on the boundary of the site so could potentially be retained.

#### Species of Principal Importance

There are records of house sparrow, greenfinch within the site and other birds typical of farmland habitats are likely to be present. Further survey and assessment will be required to determine the full impact and to identify suitable mitigation and compensation. Whilst there are no other records bats, hedgehog and other mammal species are possible at this location. Reptiles appear to be

largely absent from this area but will need to be assessed should the development proposals progress.

#### Comments on potential ecological / biodiversity impacts

Loss of arable and smaller areas of grassland and possibly hedgerows. No information to indicate that the grassland is of nature conservation value. It is likely that any areas of grassland will be modified (species poor) grassland or other neutral grassland. These are low and medium distinctiveness habitats (as ascribed in the Biodiversity Metric) respectively and their loss is usually addressed through the creation or enhancement of grassland either on-site or off-site. Arable land is low distinctiveness in terms of the Biodiversity Metric and therefore of low overall value. However, there would need to be a thorough assessment of the associated bird assemblage to ensure any significant impacts are identified.

### **3.4 Site name: Land North of Borrowash**

**Size: 1.88 ha**

#### Potential impact on features of ecological importance / value

**Low**

The overall impact is assessed as Low based on the desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are of low or medium distinctiveness. Impacts on species are probably on a local scale only but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

#### Nature conservation designations

There are no statutory or non-statutory sites present within the boundary of the site. There are no potential Local Wildlife Sites identified within this boundary or immediately adjacent.

#### Irreplaceable habitat

There are no records for irreplaceable habitats at this location.



### Protected Species

Breeding birds are likely to be present, probably nesting in the hedgerows and trees. There are no other records for protected species at this location. However, bats are widespread and probably use the site for foraging and commuting. Hedgehogs are also known from the wider area.

### Habitats of Principal Importance

There are no records of HPI on site. However, hedgerows are present and could qualify as HPI. There is a small area of scrub present in the west of the site, but this is unlikely to be a HPI.

### Species of Principal Importance

There are no records for the site. However, breeding birds, hedgehog and bats are all possible.

### Comments on potential ecological / biodiversity impacts

The site is predominantly grassland vegetation and there is no information indicating that the grassland is of nature conservation value. It is probable that the grassland will fall into either the 'modified' or 'other neutral grassland' grassland categories. These are low and medium distinctiveness habitat types respectively (as ascribed in the Biodiversity Metric) and losses are typically addressed through the creation or enhancement of grassland either on-site or off-site. The site is bounded by hedgerows which are likely to be of value locally and could be HPI. There is also scattered scrub in the west of the site.

## **3.5 Site name: Land west of Sandiacre**

**Size: 4.83 ha**

### Potential impact on features of ecological importance / value

**High**

The overall impact is assessed as High based on the desktop study and a field visit. This is primarily because the proposed development site is immediately adjacent to and includes a small part of the Stoney Clouds Local Wildlife Site and is also adjacent to the boundary of the Local Nature Reserve (the boundaries of the LWS and the LNR are slightly different). The development would result in some loss of habitats adjacent to the reserve and possibly the loss of designated grassland habitat. Development would result in an increase in pressure on the nature reserve (see below) and whilst some of these can be mitigated or avoided it would require a sympathetic development design with sufficient buffering to the nature reserve boundaries.

Most of the site is not designated and the habitats present are not irreplaceable or of very high or high nature conservation value. The grassland habitat present is likely to be low or medium distinctiveness and typically losses can be addressed through mitigation and compensation measures.

However, development in such proximity to a Local Wildlife Site and Local Nature Reserve is a significant risk and adverse impacts could result in a decline in the functionality and integrity of the reserve.

If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

#### Nature conservation designations

The boundary of the development site includes a small part of the Stoney Clouds Local Wildlife Site. The development is immediately adjacent to the Stoney Clouds Local Wildlife Site and Local Nature Reserve. There are no potential Local Wildlife Sites identified within this boundary or immediately adjacent.

#### Irreplaceable habitat

There are no records for irreplaceable habitat within the site boundary.

#### Protected Species

Breeding birds are likely to be present, probably nesting in the hedgerows and trees or foraging in the grassland. Bats and other protected mammals are known to occur locally and could be present. The adjacent habitats within Stoney Clouds nature reserve support a range of species including some protected species.

#### Habitats of Principal Importance

There are no records for HPI at this location. However, there are hedgerows present, and these could be of sufficient diversity to meet the definition for a HPI. There is no information to indicate that the grassland present is species rich and it is unlikely to be a HPI.

#### Species of Principal Importance:

Breeding birds are likely to be present, probably nesting in the hedgerows and trees or foraging in the grassland. There is a record of Corn bunting from 2018, but other than that all records are adjacent to or within 1km of the site boundary. The adjacent habitats within Stoney Clouds nature

reserve support a range of species including bats, amphibians, mammals and birds. The habitats within the proposed development site are probably used to some extent by these species for foraging, commuting, dispersing and in some cases nesting.

Comments on potential ecological / biodiversity impacts:

The site is dominated by horse grazed pastures and the grassland vegetation is relatively short. There is evidence of nutrient enrichment in places, and some poached ground is present. The grassland is potentially of sufficient diversity to meet the definition for 'other neutral grassland' (a medium distinctiveness grassland type), but some areas are probably species poor modified grassland. The grassland is unlikely to be sufficiently diverse to meet the required threshold for Lowland Meadow, though there is potential for patches of grassland to be more diverse. Part of the Stoney Clouds Local Wildlife Site is included within the site boundary. This area supports unmanaged grassland that is likely to be 'other neutral grassland'. It is not especially diverse based on current information. However, it does provide additional habitat linked directly to the nature reserve and will be used by a variety of small mammals, amphibians, insects etc. There are also hedgerows and trees present within the site.

Impacts on the above habitats would typically be considered to be a localized impact, but the site is very close to the Stoney Clouds nature reserve with its eastern boundary adjoining the boundary of the reserve. Development in this location therefore has the potential to adversely affect nature reserve through indirect impacts on species and habitats. Indirect impacts could include the following: -

- Loss of complementary habitats that help support populations of animals within the nature reserve (e.g. pollinating insects)
- Increased recreational disturbance and pressure
- Increased noise pollution
- Increased light pollution
- Escape of non-native plant species including some that could be invasive
- Increased predation of wildlife by domestic pets
- Nutrient enrichment of the reserve (dogs)
- Effects on the hydrology of the site possibly leading to changes in hydro-ecology.

There are potentially ways that a development proposal could try to avoid and minimize these impacts e.g. creating buffer greenspace habitat between development and the reserve. Creating alternative greenspace for people to use locally. Contributing to the management and

enhancement of the reserve itself. However, there is clearly a risk to the LWS and LNR if development takes place in such proximity.

### **3.6 Site name: Land south of West Hallam**

**Size: 3.85**

#### Potential impact on features of ecological importance / value

**Low**

The overall impact is assessed as Low based on the desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are likely to be low or medium distinctiveness. Impacts on species are probably on a local scale but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

#### Nature conservation designations

There are no statutory or non-statutory sites present within the boundary of the site. There are no potential Local Wildlife Sites identified within this boundary or immediately adjacent.

#### Irreplaceable habitat

There are no records for irreplaceable habitats at this location.

#### Protected Species

Breeding birds are likely to be present, probably nesting in the hedgerows and trees. There are no other records for protected species at this location. However, bats are widespread and probably use the site for foraging and commuting. Hedgehogs are also known from the wider area.

#### Habitats of Principal Importance

There are no records of HPI on site. However, hedgerows are present and could qualify as HPI.

#### Species of Principal Importance

There are no records for the site. However, breeding birds, hedgehog and bats are all possible.

#### Comments on potential ecological / biodiversity impacts

The site is predominantly grassland vegetation and there is no information indicating that the grassland is of nature conservation value. It is probable that the grassland will fall into either the 'modified' or 'other neutral grassland' grassland categories. These are low and medium distinctiveness habitat types respectively (as ascribed in the Biodiversity Metric) and losses are typically addressed through the creation or enhancement of grassland either on-site or off-site. However, there are signs that the grassland is unmanaged and as such it could be of greater interest at least in part. Retention of boundary hedgerows is advisable.

### **3.7 Site name: Land north of West Hallam**

**Size: 1.65 ha**

#### Potential impact on features of ecological importance / value

**Low**

The overall impact is assessed as Low based on the desktop study. This is primarily because there are no designated sites or irreplaceable habitats affected, and the habitats present are likely to be low or medium distinctiveness. Impacts on species are probably on a local scale but will need to be addressed through mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

#### Nature conservation designations

There are no statutory or non-statutory sites present within the boundary of the site. There are no potential Local Wildlife Sites identified within this boundary or immediately adjacent.

#### Irreplaceable habitat

There are no records for irreplaceable habitats at this location.

#### Protected Species

Breeding birds are likely to be present, probably nesting in the hedgerows and trees. There are no other records for protected species at this location. However, bats are widespread and probably use the site for foraging and commuting. Hedgehogs are also known from the wider area.

#### Habitats of Principal Importance

There are no records of HPI on site. However, hedgerows are present and could qualify as HPI.

### Species of Principal Importance

There are no records for the site. However, breeding birds, hedgehog and bats are all possible.

### Comments on potential ecological / biodiversity impacts

The site is predominantly grassland vegetation and there is no information indicating that the grassland is of nature conservation value. It is probable that the grassland will fall into either the 'modified' or 'other neutral grassland' grassland categories. These are low and medium distinctiveness habitat types respectively (as ascribed in the Biodiversity Metric) and losses are typically addressed through the creation or enhancement of grassland either on-site or off-site. However, there are signs that the grassland is unmanaged and as such it could be of greater interest at least in part. Retention of boundary hedgerows is advisable.

### **3.8 Site name: Land north of Breadsall Hilltop**

**Size: 8.9 ha**

### Potential impact on features of ecological importance / value

**Medium - High**

The overall impact is assessed as Medium - High based on the desktop study. Whilst there are no designated sites or irreplaceable habitats affected this is a relatively large site and the level of impact could vary from Medium (possibly Low) to High depending upon the extent to which the more valuable habitats on site can be retained and mitigation and compensation measures can be implemented for indirect impacts on the adjacent LWS. The risk to deciduous woodland, scrub and a pond as well as potential indirect impacts on adjacent Local Wildlife Site (Breadsall Disused Railway ER005) are the main concerns.

There would appear to be some scope to try and retain woodland, hedgerows and the pond but as these areas are included within the site boundary it is assumed they are at risk. The woodland in the north-east of the site adjacent to the LWS boundary and disused railway is potentially of high value and could be Lowland Mixed Deciduous Woodland. Equally in the south of the site there is a scrubby area with a small pond/wetland. If the woodland, scrub and pond habitats are retained the overall impact is likely to be significantly lower.

The remainder of the site supports habitats of low nature conservation value, though arable land can support a variety of birds and mammals. However, impacts on species are probably on a local

scale and could be addressed by mitigation and compensation measures. If development proposals progress, detailed ecological surveys will be required together with assessments for Biodiversity Net Gain.

#### Nature conservation designations

There are no statutory or non-statutory sites present within the boundary of the site. There is a non-statutory Local Wildlife Site immediately adjacent to the north of the development (Breadsall Railway) and a potential Local Wildlife Site to the east.

#### Irreplaceable habitat

There are no records for irreplaceable habitats at this location. However, there are several records of veteran trees in proximity to the site boundaries.

#### Protected Species

Protected species are present within this site including mammals, breeding birds and bats.

#### Habitats of Principal Importance

There are no records of HPI on site. However, deciduous woodland, hedgerows and a pond are present and these could qualify as HPI.

#### Species of Principal Importance

Breeding birds and mammals are present in the area.

#### Comments on potential ecological / biodiversity impacts

The development will result in the loss of arable land and small areas of species poor and / or moderately rich grassland and possibly deciduous woodland. The woodland could be Lowland Mixed Deciduous Woodland. The site is adjacent to Breadsall Railway LWS and a potential LWS (acid grassland) and the woodland in this location is contributing to the value of both of these sites.

Indirect impacts on Breadsall Disused Railway LWS re also a concern but as the LWS is a linear site that is already a multi-user route it can probably absorb some additional recreational pressure. The potential LWS is probably less accessible to people so recreational impacts are unlikely. Other indirect impacts such as noise and light pollution could still be a risk and will need to be addressed. A buffer will be needed between any development and the Breadsall Trail.

Veteran trees are recorded on adjacent land and the development could indirectly affect these trees.

Retention of woodland, pond, scrub and boundary hedgerows is advisable and would significantly reduce the direct impact in terms of habitat losses. .

Impacts on species could include farmland birds, protected mammals and bats and will require careful design and both on-site and off-site mitigation and compensation measures.

Please contact me if you wish to discuss the above comments.

Yours sincerely,

*Kieron Huston*

Kieron Huston MCIEEM

Head of Biodiversity Planning

[khuston@derbyshirewt.co.uk](mailto:khuston@derbyshirewt.co.uk)

[planning@derbyshirewt.co.uk](mailto:planning@derbyshirewt.co.uk)